

Gary M. Hoffman (*Pro Hac Vice*)  
Kenneth W. Brothers (*Pro Hac Vice*)  
DICKSTEIN SHAPIRO MORIN  
& OSHINSKY, LLP  
2101 L Street, NW  
Washington, DC 20037-1526  
Phone (202) 785-9700  
Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)  
DICKSTEIN SHAPIRO MORIN  
& OSHINSKY, LLP  
1177 Avenue of the Americas  
New York, New York 10036-2714  
Phone (212) 835-1400  
Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715  
Jonathan Weissglass, State Bar No. 185008  
**ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAIN**  
177 Post Street, Suite 300  
San Francisco, California 94108  
Phone (415) 421-7151  
Fax (415) 362-8064

Attorneys for Ricoh Company, Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,  
vs.

AEROFLEX INC., et al.

Defendants.

---

SYNOPSIS.,

VS. Plaintiff,

RICOH COMPANY, LTD.  
Defendant.

Case No. C03-4669 MJJ (EMC)  
Case No. C03-2289 MJJ (EMC)

**DECLARATION OF MICHAEL A. WEINSTEIN IN SUPPORT OF ADMINISTRATIVE MOTION FOR A SEALING ORDER**

1 Michael A. Weinstein declares as follows:

2 1. My name is Michael A. Weinstein, an attorney with the law firm of Dickstein, Shapiro,  
3 Morin & Oshinsky, LLP, counsel for Ricoh Company Limited. I am over the age of 21 and am  
4 competent to make this declaration. Based on my personal knowledge and information, I hereby declare  
5 to all the facts in this declaration.

6 2. In case C03-4669, a Stipulated Protect Order ("Order1") was entered into on June 3, 2003  
7 between the parties.

8 3. In case C03-2289, a Stipulated Protect Order ("Order2") was entered into on March 24,  
9 2004 between the parties.

10 4. On June 21, 2006, counsel for Synopsys/Aeroflex et al. filed with the court a Reply  
11 Memorandum in Support of Defendants' Motion to Compel Discovery, and a declaration with numerous  
12 exhibits in support of Reply Memorandum, including a number of Ricoh's confidential documents  
13 clearly marked "CONFIDENTIAL."

14 5. Ricoh Company, Ltd. requests permission to file under seal the following documents and  
15 exhibits which are designated confidential as defined in both Order1 and Order2.

16 a. Exhibits 2, 7, 8, 13, and 23.

17 6. On June 21, 2006, counsel for Synopsys/Aeroflex et al. filed with the court  
18 "Administrative Motion for a Sealing Order" requesting certain exhibits be filed under seal.

19 7. It is believed that the identified documents of 5a, *supra*, are privileged or protectable as a  
20 trade secret or otherwise entitled to protection.

21 8. As such, the above identified exhibits should be filed under seal pursuant to Order1 and  
22 Order2.

23 I declare under penalty of perjury under the laws of the United States of America that the  
24 foregoing is true and correct.

25 Signed at Washington, D.C. on June 24, 2006.

26  
27  
28 June 24, 2006

/s/ Michael A. Weinstein  
Michael A. Weinstein

Gary M. Hoffman (*Pro Hac Vice*)  
 Kenneth W. Brothers(*Pro Hac Vice*)  
 DICKSTEIN SHAPIRO MORIN  
 & OSHINSKY, LLP  
 2101 L Street, NW  
 Washington, DC 20037-1526  
 Phone (202) 785-9700  
 Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)  
 DICKSTEIN SHAPIRO MORIN  
 & OSHINSKY, LLP  
 1177 Avenue of the Americas  
 New York, New York 10036-2714  
 Phone (212) 835-1400  
 Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715  
 Jonathan Weissglass, State Bar No. 185008  
 ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAINE  
 177 Post Street, Suite 300  
 San Francisco, California 94108  
 Phone (415) 421-7151  
 Fax (415) 362-8064

Attorneys for Ricoh Company, Ltd.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

RICOH COMPANY, LTD.,  
 Plaintiff,

vs.

AEROFLEX ET AL,  
 Defendants.

**CASE NO. CV 03-4669 MJJ (EMC)  
 CASE NO. CV 03-2289 MJJ (EMC)**

**[PROPOSED] ORDER GRANTING  
 ADMINISTRATIVE MOTION FOR A  
 SEALING ORDER**

SYNOPSISYS, INC.,  
 Plaintiff,

vs.

RICOH COMPANY, LTD.,  
 Defendants.

1 On June 21, 2006, counsel for Synopsys/Aeroflex et al. filed an Administrative Motion for a  
2 Sealing Order pursuant to Civil Local Rule 79-5(d), and requested permission to file under seal the  
3 following Exhibits:

4 1. Exhibits 2, 7, 8, 13, and 23.

5 Because the above documents include and refer to materials produced in discovery and  
6 designated confidential by Ricoh Company, Ltd., this request was made pursuant to the Stipulated  
7 Protective Order in this action.

8 The Court hereby GRANTS this request.

9 IT IS SO ORDERED.

10  
11 Dated: \_\_\_\_\_

12 \_\_\_\_\_  
13 The Honorable Edward M. Chen  
14 Magistrate Judge, United States District Court  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28